

EXHIBIT A

Timekeeper and hourly rate

John W. Morris (JWM) \$290.00/hour

Adam R. Schwartz (ARS) \$290.00/hour

Dennis O'Neil Cowling (DOC) \$230.00/hour

Act. Date	Activity Description	Atty	Hours	Amount
2/28/24	Revise papers regarding affidavit for certificates of default and update affidavits of service.	ARS	0.90	\$261.00
2/28/24	T/c with SDNY Clerk's Office (judgments) re Clerk's new requirements for proposed entry of Clerk's Default document with affirmation in support of entry of default.	DOC	0.30	\$69.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bighorn Investments and Properties' default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bighorn Sand & Gravel's default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bridgelink Commodities' default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bridgelink Engineering's default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bridgelink Investments' default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bridgelink Renewable Energy Development's default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bridgelink Renewable Energy Investments' default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Cord Henry Johnson's default.	DOC	0.40	\$92.00
2/28/24	Draft and revise affirmation in support of request for Clerk to file Certificates of Default against several the majority of defendants.	DOC	1.30	\$299.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Bighorn Construction and Reclamation's default.	DOC	0.40	\$92.00
2/28/24	Draft and revise proposed Clerk's Certificate of Default for Cassie Hamilton's default.	DOC	0.40	\$92.00
2/29/24	Draft and revise proposed Clerk's Certificate of Default for Bridgelink Engineering default.	DOC	0.10	\$23.00
2/29/24	Draft and revise proposed Clerk's Certificate of Default for Cassie Hamilton default.	DOC	0.10	\$23.00

2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bighorn Construction and Reclamation .	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bighorn Investments and Properties.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bighorn Sand and Gravel.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bridgelink Commodities.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bridgelink Engineering.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bridgelink Investments.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bridgelink Renewable Energy Development.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Bridgelink Renewable Energy Investments.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Cassie Hamilton.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with proposed Certificate of Default against Cord Henry Johnson.	DOC	0.20	\$46.00
2/29/24	Draft and revise docketing information in conjunction with submission of Affirmation in Support of Request for certificates of default against ten defendants against whom default is requested to be issued and entered on the record.	DOC	0.30	\$69.00
2/29/24	Review and analyze Certificate of Default entered against Bighorn Construction and Reclamation.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Bighorn Investments and Properties.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Bighorn Sand and Gravel.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Bridgelink Commodities.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Bridgelink Engineering.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Bridgelink Investments.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Bridgelink Renewable Energy Development.	DOC	0.10	\$23.00

2/29/24	Review and analyze Certificate of Default entered against Bridgelink Renewable Energy Investments.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Cassie Hamilton.	DOC	0.10	\$23.00
2/29/24	Review and analyze Certificate of Default entered against Cord Henry Johnson.	DOC	0.10	\$23.00
2/29/24	Draft and revise email report that requests for Certificates of Default against 10 Defendants have been submitted for review by the Court.	DOC	0.10	\$23.00
2/29/24	Draft and revise email report that Certificates of Default against 10 Defendants have been entered against those Defendants with copies of certificates entered.	DOC	0.10	\$23.00
3/19/24	Analyze emails and claims by counsel for indemnitors regarding service and extension of time and failure to recognize default certificates entered by court.	ARS	0.90	\$261.00
3/19/24	Telephone call from counsel for indemnitors regarding extension.	JWM	0.10	\$29.00
3/19/24	Two telephone conferences with Vikesh N. Patel, Kearney, McWilliams & Davis, PLLC Houston TX representing all defendants. Requests for two weeks to retain local counsel and answer.	DOC	0.20	\$46.00
3/19/24	Draft and revise email report re telephone conference with Vikesh N. Patel, Kearney, McWilliams & Davis, PLLC Houston TX representing all defendants and request for two weeks to retain local counsel and answer.	DOC	0.30	\$69.00
3/19/24	Draft and revise proposed email to R. Slepisky re request from Vikesh Patel of Kearney, McWilliams & Davis, PLLC Houston TX representing all defendants and request authority.	DOC	0.60	\$138.00
3/20/24	Prepare strategy regarding untimely answer and failure to move to set aside defaults.	ARS	0.80	\$232.00
3/20/24	Conference call with Ryan Slepisky regarding discussion with counsel for indemnitors.	JWM	0.50	\$145.00
3/20/24	Draft and revise email re Clerk's Office rejecting Vikesh Patel's application for pro hac vice admission for deficiencies.	DOC	0.10	\$23.00
3/20/24	Review and analyze Vikesh Patel's motion for admission pro hac vice on behalf of served defendants.	DOC	0.20	\$46.00
3/20/24	Review and analyze Answer filed by Vikesh Patel on behalf of all defendants.	DOC	0.60	\$138.00
3/20/24	Draft and revise current activity summary re Defendants' Answer, motion for attorney admission pro hac vice and return of motion for deficiencies by SDNY Clerk.	DOC	0.20	\$46.00
3/20/24	Review and analyze federal rules and cases re strategy to oppose action by Vikesh Patel and purported answer he filed on behalf of all Defendants.	DOC	0.60	\$138.00
3/21/24	Follow-up call with counsel for indemnitors regarding extension and representation of all defendants.	JWM	0.20	\$58.00

3/21/24	Review and analyze Amended Complaint, purported answer filed on behalf of all Defendants and Cowling Affirmation and exhibits in conjunction with drafting and revising opposition and objection to Defendants' motion for 14 day time extension because Rule 55(c) not invoked. Defendants fail test for good cause.	DOC	1.30	\$299.00
3/21/24	Drafting and revising objection and opposition to Defendants' motion for 14 day time extension to answer.	DOC	0.90	\$207.00
3/21/24	Review and analyze Rule 55 and related cases in conjunction with drafting and revision objection and opposition to Defendants' motion for 14 day time extension to answer.	DOC	3.40	\$782.00
3/21/24	Draft and revise report re Vikesh Patel's motion and supporting affidavit for Defendants' motion for 14 day time extension to answer.	DOC	0.30	\$69.00
3/21/24	Review and analyze Judge Woods's individual rules and local rules re guide to follow in responding to Defendants' motion and supporting affidavit for a 14 day time extension to answer.	DOC	0.30	\$69.00
3/21/24	Draft and revise email re Clerk's Office clears Patel's pro hac vice following his remedying of deficiencies.	DOC	0.10	\$23.00
3/22/24	Prepare correspondence to court regarding grounds to set aside default and request for fees.	ARS	2.60	\$754.00
3/22/24	Drafted portions of status report to client regarding service of process and potential application for fees arising from defendant's failure to comply with local rules.	JWM	0.90	\$261.00
3/22/24	Telephone conference with client regarding potential application against indemnitors.	JWM	0.10	\$29.00
3/22/24	Review and analyze Rule 55 and cases in conjunction with drafting and revising objection and opposition to Defendants' motion for 14 day time extension to answer.	DOC	1.80	\$414.00
3/22/24	Drafting and revising objection and opposition to Defendants' motion for 14 day time extension to answer.	DOC	0.90	\$207.00
3/25/24	Prepare opposition to motion to amend and supporting case law.	ARS	4.80	\$1,392.00
3/25/24	Drafting and revising opposition letter to Defendants' motion to extend time for Judge Woods, USDJ, requesting conditions on any extension.	DOC	3.30	\$759.00
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